

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF VERMONT

In re:	)	Case No.: 09-10667
	)	
JERE C. WRIGHT,	)	Chapter 13
	)	
Debtor.	)	

**MOTION TO SELL**

Now comes Jere Wright, by and through Michelle Kainen, and prays that the court permit the Debtor to sell vacant land and in support states as follows:

1. The Debtor filed his chapter 13 petition on June 9, 2009.
2. The Debtor has signed a purchase and sale agreement to sell the acreage, commonly known as 1083 Old Bow Road, Weathersfield, Vermont to Timothy Watkins of Weathersfield, Vermont (Exhibit A);
3. The proposed distribution from the sale is as follows:

Contract price	<u>\$ 12,000.00</u>
Less:	
Attorneys fees for motion (assuming no hearing attendance)	\$ 300.00
Closing costs (approx)	\$ 350.00
8% real estate commission (Town and Country Realty)	\$ 960.00
 Total proceeds to trustee for distribution to creditors (approx)	 \$ 10,390.00

Wherefore it is prayed that the court approve the sale of the debtor's property, and grant such further relief as is just.

Dated this 14<sup>th</sup> day of December, 2009

By: /s/ Michelle Kainen

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